

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA,	)	
Petitioner,	)	
	)	
v.	)	M.B.D. No. 04-10125-GAO
	)	
JANICE CHACE,	)	
Respondent.	)	
_____	)	

**MOTION TO WITHDRAW PETITION  
TO ENFORCE INTERNAL REVENUE SERVICE SUMMONS**

The United States of America, on behalf of its agency, the Internal Revenue Service, and by its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby moves this Court to withdraw the Petition to Enforce Internal Revenue Summons which was filed on April 27, 2004.

On June 10, 2004, this Court entered an Order Enforcing the Internal Revenue Service Summons for the respondent to comply by July 9, 2004.

-2-

The petitioner now seeks to withdraw its petition because the respondent, Janice Chace, has complied with the Internal Revenue Service Summons.

Respectfully submitted:

MICHAEL J. SULLIVAN,  
United States Attorney

By: /s/ Barbara Healy Smith  
BARBARA HEALY SMITH  
Assistant U.S. Attorney  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way - Suite 9200  
Boston, MA 02210  
(617) 748-3282

Certificate of Service

I hereby certify that on this day I gave notice of the foregoing by mailing a copy of same, postage prepaid, first class mail to Janice Chace, 50 Briggs Avenue, Somerset, MA 02725.

/s/ Barbara Healy Smith

Dated: March 25, 2005